

JOSEPH P. RUSSONIELLO (CSBN 44332)
United States Attorney

BRIAN J. STRETCH (CSBN 163973)
Chief, Criminal Division

STEPHANIE M. HINDS (CSBN 154284)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102
Telephone: (415) 436-6816
Facsimile: (415) 436-6748
Email: stephanie.hinds@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
RAHMAT ABDHIR AND ZULKIFLI)
ABDHIR,)
)
Defendants.)

No. CR 07-00501 JF

**NOTICE OF RELATED CASES AND/OR
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES SHOULD
BE RELATED**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
1) \$1,774.65 IN WELLS FARGO)
ACCOUNT XXXXXX4687;)
)
2) \$4,906.28 IN BANK OF AMERICA)
ACCOUNT XXXXXX1479;)
)
3) \$18,944.75 IN E*TRADE FINANCIAL)
ACCOUNT XXX-22920;)
)
4) 1998 SUZUKI SIDEKICK, VIN)
JS3TD21V8W4100132, CALIFORNIA)
LICENSE 4YYF388; AND)
)
5) MISCELLANEOUS FIREARMS AND)
AMMUNITION,)
Defendants.)

No. CV 08-0496 PVT

1 The United States hereby submits this Notice of Related Cases pursuant to Civil Local
2 Rule 3-12 and Criminal Local Rule 8-1. The government contends that the above-captioned
3 matters are related because they were borne out of the same investigation which resulted in an
4 indictment of defendant and potential claimant, Rahmat Abdhir, as an individual engaged in
5 planning or perpetuating acts of international terrorism against a foreign government.

6 On August 1, 2007, a federal grand jury for the Northern District of California sitting in
7 San Jose returned an indictment charging Rahmat Abdhir and Zulkifli Abdhir with conspiracy to
8 provide and providing material support to terrorists, in violation of Title 18, United States Code,
9 Section 2339A; contributing goods and services to a Specially Designated Global Terrorist, in
10 violation of Title 50, United States Code, Section 1705, and making material false statements, in
11 violation of Title 18, United States Code, Section 1001.

12 On January 23, 2008, plaintiff commenced a civil action seeking forfeiture against the
13 defendants \$1,1774.65 in funds seized from Wells Fargo Account xxxxxx4687 held in the name
14 of Rahmat Abdhir, \$4,906.28 in funds seized from Bank of America Account xxxxxx1479 held
15 in the name of Rahmat Abdhir, \$18,944.75 in funds seized from E*Trade Financial Account
16 xxx-22920 (also identified by account number xxxxxxxxxxx1814) held in the name of Rahmat
17 Abdhir, a 1998 Suzuki Sidekick, VIN JS3TD21V8W4100132, California License, 4YYF388 and
18 miscellaneous firearms and ammunition (collectively referred to as "defendant property). In its
19 complaint, the government alleged that the defendant property is subject to forfeiture pursuant to
20 Title 18, United States Code, Section 981(a)(1)(G)(iv). There is also probable cause to believe
21 that the defendant property was used or intended to be used in preparation and carrying out of
22 violations of Title 18, United States Code, Sections 956(a)(1) and 2339A.

23 As evidenced above, these cases are related in that they both concern the facts and
24 circumstances relating to Rahmat Abdhir's illegal activities. Both cases may generate identical
25 motions, evidentiary issues, and questions of law. It appears likely that there will be an unduly

26 //

27 //

1 burdensome duplication of labor and expense or conflicting results if the cases are conducted
2 before different judges. Assignment to a single judge is likely to conserve judicial resources and
3 promote an efficient determination of the action.

4 Dated: February 4, 2008

Respectfully submitted,

5 JOSEPH P. RUSSONIELLO
6 United States Attorney

7 /S/
8 STEPHANIE M. HINDS
9 Assistant United States Attorney
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28